

EXHIBIT F

September 8, 2021

Ms. Denise Brown
Mail Stop 6N-518
Office of Regulatory Affairs
Bureau of Alcohol, Tobacco, Firearms, and Explosives
Department of Justice
99 New York Ave. NE,
Washington, DC 20226

Re: Comments in "Factoring Criteria for Firearms With Attached 'Stabilizing Braces,'" Docket No. ATF 2021R-08, AG Order No. 5070-2021

Dear Ms. Brown:

My name is Richard Cicero, a retired Police Firearms Instructor with NRA, Sig Sauer, Smith & Wesson, Simunitions, state, federal, and military credentials. On 4 Aug. 2010 I was injured on a foot patrol in Afghanistan where I lost an arm and a leg. In 2012 the first "Brace" was created, and a world of opportunity opened for me and so many others. The original Sig Brace was the birth of my return to teaching so many others to shoot again. (Fig. 1, 2.)

At this time as a seasoned Senior Firearms Instructor, I had the knowledge to put the device into safe practical operation for me and so many others. I worked with SB Tactical and Sig Sauer personnel to perfect these techniques. We put these techniques into an official Lesson Plan at the Sig Sauer Academy, that is still the standard today. I was never paid for my work with the "Brace", but a portion of the profits funded the Learn to Shoot Again (LTSA) program I ran for years to teach others with challenges to shoot using "Braced" guns as a foundation of the program.

Over the last several years, I have trained hundreds of physically challenged students, some only having one or two fingers. The "Braces" are not just for amputees, but those who have a loss of mobility, strength, sensation, and stability all benefit from its use too! These efforts were conducted quietly to preserve the dignity of myself and my students. Now it is time to clarify how the industry and the "Brace" truly worked to benefit so many.

After the Federal Government issued new guidance for review on Pistol Stabilizing Braces a few weeks ago, I realized the need for my input. For years I have heard how there never was a legitimate purpose for the brace and there never was a "one armed guy" who was involved. Well, I am that "one armed guy" who started helping SB Tactical and Sig Sauer develop the braces as well as how to best use them. The positions we have developed include the modified weaver position, proper cheek/chin weld and chest weld positions. These positions are illustrated in enclosed figures, and none involve shouldering:

- The "proper grip" for a Modified Weaver Stance: Fig. 3a, 3b
- The Modified Weaver Stance: Fig. 4
- The Cheek/Chin Weld: The Chest Weld: Fig. 5a, 5b
- The Chest Weld: Fig. 6

Many shooters have attempted to use these positions, but poor experience and training has led some who were less educated to use them improperly, as so many do with other firearms as well as a multitude of household items. However, that does not undermine the utility of braces to so many.

Instructors from the Sig Sauer Academy, LTSA, and others have been teaching the proper use of the “Braces” for years. Training and presentations for the ATF Firearms Instructors, Tactical Teams, and Canine Units have also been conducted by myself and Sig Sauer staff.

The braces have also allowed able-bodied shooters, including beginning shooters and shooters with less physical strength, more safely use these firearms. Several law enforcement agencies have employed “Braces” in these capacities effectively, and one local agency has added them to their motorcycle units as well.

These braces work effectively in platforms from .22LR to .300BO, in designs including “Blueguns” (inert training guns), the “Roni” (which prepares the student to transition to a traditional hip carried pistol by placing it into a “Braced” frame), CZ-Scorpion, AR Pistols, Uzi, AK, 556xi, MPX, and MCX with great performance. These firearms vary greatly in weight and size to give the shooter the option which best supports their personal abilities.

These options have helped train thousands of injured shooters to return to safe fulfilling hobbies which motivated them to sobriety and improved quality of life. They have also helped able-bodied shooters use firearms safely. Unfortunately, the weight cut offs contemplated on proposed ATF Worksheet 4999 that would have the effect of limiting the use of braces to weapons between 4 lbs and 7.5 lbs will greatly reduce these options. This is particularly true for beginning shooters, who often require braces for weapons as light as 2 lbs.¹

The focus of proposed ATF Worksheet 4999 on one-handed shooting is also a problem for the disabled community. Requiring one handed use to qualify the weapon as a pistol would effectively rule out use with prosthetic support as well as those with missing digits.

The proposed worksheet is also mistaken to weight “adjustability” as evidence that the brace will be used for shouldering. In fact, the flexibility of these adjustable platforms suits a great many students who are learning to shoot with a brace – regardless of their physical challenges.²

The same is true for other features ATF Worksheet 4999 would wrongly weight as evidence of shouldering, such as slings, mounts, and sights. As I explained in 2019, “[t]he variety of braces, sighting options, slings and the addition of a Quick Clip, create many options for our students. The Quick Clip provides the shooter (especially the one armed shooter) with a stable point to improve loading, movement and malfunction clearing.”³ ATF has not adequately considered how its new proposal would harm these shooters.

1 See Attachment C (Rick Cicero, *Adaptive Shooting Techniques: PCCS are a Perfect Fit! Using a Pistol Caliber Carbine to get back on the range*, Tactical Journal, pp. 14-17 (2019), available at https://www.idpa.com/wp-content/uploads/2019/05/TJ_Summer_2019_WEB.pdf).

2 *Id.* at 16.

3 *Id.*

The quiet "Disabled Community" has kept quiet over the years to how these firearms have helped them. Now these proposed rules will limit the choice of firearms available for teaching the disabled shooter. The weight controls will specifically remove the smaller platforms like the .22LR and "Roni" options that introduce many of these citizens back to shooting safely. These items have instilled the fundamentals to create stable, consistent repeatable skills within their limitations to safely join the shooting sports. Without viable options these shooters will face increased safety challenges that will also endanger other shooters in the area. Such concerns will keep these shooters from being safe shooters in the sporting community. For so many of my students the success achieved with the "Braces" has instilled a sense of confidence that has translated into many other positive life changes.

These aspects are amplified among the injured veteran population. Firearms are part of our lives. Firearms are part of what brought us through the most challenging times in our lives and they remain an integral aspect of our recovery. The environment of the range is very welcoming to us for relaxation and inclusion. Removing that ability, especially in the elements they are accustomed to, have an even greater impact on their recovery for the long term.

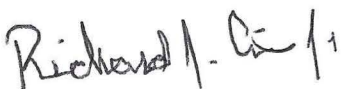
The proposed limiting of access and increased cost of the ownership of these firearms translates into yet one more item being removed from the access of those with disabilities. The Americans with Disabilities Act was specifically created to prevent such limitations or additional costs. The work within the Firearms industry to embrace the disabled community since the "Brace" has been the most substantial since the end of World War II. Limiting the "Brace" as proposed will discourage disabled participation of those with injuries similar to mine, creating an unwelcome environment in shooting sports. I speak from personal experience when I say the "Brace changed my life to make certain activities possible again." With these opportunities I was able to use my decades as a Senior Firearms instructor to develop further instructional techniques for myself and thousands in the disabled community.

Unfortunately, as with everything from cars to cough medicine, some people have misused or even committed a crime with these firearms. However, when compared to hammers, bats, knives and automobiles there are far more crimes committed with each of these items than with braces.

There are so many success stories, but the most impactful is Nate. He lost an arm while in the US Air Force, this brought him to me as a student. Over the years I successfully taught Nate to shoot a pistol and a Braced AR. Later this even led him to becoming a certified NRA Firearms Instructor. When he retired from military service, he returned to his home state, where he became the first one armed Correctional officer and a Firearms Instructor for the agency. This was all possible due to the "Braced" firearms he learned to use. (Fig. 7.)

In light of these considerations, I urge ATF to reject the proposed rule and worksheet.

Respectfully,

A handwritten signature in black ink that reads "Richard Cicero". The signature is written in a cursive, flowing style.

Richard Cicero

Enclosures:

Attachment A: Figures 1–7

Attachment B: Sig Brace Lesson Plan

Attachment C: Article on Adaptive Shooting Techniques

Fig. 1



Fig. 2



Fig. 3a,3b



Fig. 4



Fig. 5a,5b



Fig. 6



Fig. 7

